

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

As representative of

THE COMMONWEALTH OF PUERTO
RICO, *et. als.*

Debtors¹

PROMESA Title III

No. 17 BK 3283 (LTS)

(Jointly Administered)

**POTRERO LOS LLANOS, INC.'S MOTION FOR LEAVE TO AMEND PROOF
OF CLAIM KROLL NUMBER 180517**

TO THE HONORABLE COURT:

COMES NOW, Potrero Los Llanos, Inc. ("Los Llanos"), through its undersigned counsel, and respectfully states and requests:

1. On May 21, 2018, Los Llanos filed Claim No. 17818 against the Commonwealth of Puerto Rico (the "Commonwealth") for \$11,013.06 premised on eight (8) vouchers due for incentives as to the sale of eight (8) yearlings during its yearly sale of August 6, 2015, submitted for payment to the Administration of the Industry and the Racing Sport ("AIDH") and approved thereby (the "Claim").

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. On September 8, 2022, Los Llanos forwarded an amended proof of claim to correct the amount of the Claim from \$11,013.06 to \$11,200.00 and voucher number 16890405 to read as 16890407.

3. On September 9, 2022, Los Llanos file an Informative Motion indicating that the new claim number assigned by Kroll Restructuring Administration to the Claim is 180517 for the Court to take notice thereof [ECF No. 22128].

4. On January 18, 2022, the Court entered an order and judgment confirming the Modified Eighth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, the Employee Retirement System and the Puerto Rico Public Building Authority [ECF No. 19813] (the “Confirmation Order”).

5. Paragraph 42 of the Confirmation Order provides that “[a]s of the commencement of the Confirmation Hearing, a proof of Claim may not be amended without the approval of the Title III Court”. Confirmation Order at 44.

WHEREFORE, it is respectfully requested that the Court grant Los Llanos leave to amend its proof of Claim Kroll number 180517, as indicated in paragraph 2 hereof, as set forth on the proposed order attached hereto.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all ECF participants.

San Juan, Puerto Rico, this 26th day of September 2022

s/CHARLES A. CUPRILL-HERNÁNDEZ
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